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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, et al.**

Plaintiffs,

V.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF KELSEY J.
HELLAND IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION FOR 3-HOUR EXTENSION
AND INCREASED PAGE LIMIT**

The Hon. William H. Alsup

1 I, Kelsey J. Helland, declare, pursuant to 28 U.S.C. § 1746 and Local Rule 7-3, as
 2 follows:

3 1. I am a member in good standing of the State Bar of California and am admitted as
 4 a federal attorney in this Court. I represent all of the Defendants in this action.

5 2. On March 31, 2025, my co-counsel James Todd emailed counsel for Plaintiffs
 6 requesting Plaintiffs' position on Defendants' requests for (1) a three-hour extension of
 7 Defendants' deadline to file oppositions to Plaintiff State of Washington's Motion for
 8 Preliminary Injunction and Plaintiffs' Motion for Compliance with the Preliminary Injunction;
 9 and (2) a six-page increase in the page limit for Defendants' opposition to Washington's PI
 10 Motion.

11 3. Counsel for Plaintiffs Danielle Leonard responded indicating Plaintiffs had no
 12 objection to the requested three-hour extension.

13 4. Counsel for Plaintiff State of Washington Cynthia Alexander also responded,
 14 indicating that Washington did not object to the requested three-hour extension and did not
 15 object to the request to increase the page limit, so long as Defendants would agree that any reply
 16 brief by the State of Washington could be up to 21 pages. I responded that Defendants agreed to
 17 such a request.

18 5. Following Defendants' communications with Plaintiffs' counsel, Defendants
 19 determined that they only needed five additional pages, rather than six.

20
 21 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
 22 and correct.
 23

24 Dated: March 31, 2025
 25
 26
 27

/s/ *Kelsey J. Helland*
 KELSEY J. HELLAND